



**GVNW CONSULTING, INC.**

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October 1, 2018

Ms. Lynn M. Retz  
Secretary to the Commission  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

RE: Docket No. 18-CPKT-035-KSF  
*In the Matter of the Audit of Comcast Phone of Kansas, LLC by the Kanas  
Universal Service Fund (KUSF) Administrator Pursuant to K.S.A 2016 Supp. 66-  
2010(b) for KUSF Operating Year 20, Fiscal Year March 2016-February 2017.*

Dear Ms. Retz:

On July 12, 2018, Kansas Corporation Commission (KCC or Commission) issued an Order adopting GVNW Consulting, Inc.'s (GVNW) Audit Report and directing Comcast Phone of Kansas, LLC (Comcast Phone or Company) to: (1) submit Audit True-ups for the period of March through June 2016 and pay \$33,972.66 to the KUSF within 30-days of issuance of the Commission Order; (2) submit a corrected pleading and/or affidavit from a Comcast Phone officer affirming it uses a company-specific traffic factor study to allocate VoIP revenue between the interstate and intrastate jurisdictions, the time period of each factor, and that the methodology was used for Federal Universal Service Fund (USF) and KUSF purposes; (3) to pay a \$2,100 penalty for reporting violations within 30-days from the date of the Order; and (4) clearly identify the KUSF surcharge as a separate line item on a subscriber's bill and provide ten (10) copies of subscriber bills to GVNW that clearly show the KUSF surcharge as a separate line item. The Commission Order further directed GVNW, upon completion of the foregoing requirements, to submit a Compliance report.

On July 18, 2018, the Company filed a revised notice that detailed the specific allocations used by Comcast Phone for the period of January 2012 through March 2018 that was accompanied by an affidavit from a Comcast Phone officer affirming its traffic study methodology in accordance with the Commission's Order.

On August 2, 2018, Comcast Phone remitted payment of the \$2,100 penalty to the Commission's Fiscal Office and submitted the required Audit True-ups to GVNW and paid \$33,972.66 to the KUSF.

Comcast Phone, on September 10, 2018, filed a motion for extension of time that requested a 21-day extension to October 1, 2018 to submit the ordered ten (10) copies of subscriber bills to GVNW that clearly showed the KUSF surcharge as a separate line item. The Commission, on September 13, 2018, granted the Company's request and on September 25, 2018, Comcast Phone provided copies of the required subscriber bills with no discrepancies noted. Therefore, GVNW recommends that the Commission determine Comcast Phone is in compliance with the Commission's Order and that Docket No. 18-CPKT-035-KSF be closed.

Sincerely,

A handwritten signature in black ink, appearing to read 'DW', with a stylized flourish extending to the right.

David Winter  
Senior Consultant

cc w/encl: Sandy Reams

## CERTIFICATE OF SERVICE

I hereby certify that on this 1<sup>st</sup> day of October 2018, the above Kansas Universal Service Fund Compliance Report was e-filed with the Kansas Corporation Commission and a copy was sent via electronic mail and/or U.S. Mail to:

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